

STATE OF MARYLAND



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FEB 08 2002

MICHAEL J. TRAVIESO
PEOPLE'S COUNSEL

SANDRA MINCH GUTHORN
DEPUTY PEOPLE'S COUNSEL

DONALD F. ROGERS
PAULA M. CARMODY
CYNTHIA GREEN-WARREN
THERESA V. CZARSKI
WILLIAM F. FIELDS
LUANNE P. MCKENNA
RICHARD T. MILLER

MARYLAND PEOPLE'S COUNSEL

WILLIAM DONALD SCHAEFER TOWER
6 ST. PAUL STREET, SUITE 2102
BALTIMORE, MARYLAND 21202
(410) 767-8150
(800) 207-4055
FAX (410) 333-3616

February 7, 2002

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, D.C. 20554

Re: Common Carrier Docket Nos. 96-262 and 94-1

Dear Ms. Salas:

The purpose of this letter is specifically to request confidential treatment of the "Proprietary Version" of Reply Comments filed by the National Association of State Utility Consumer Advocates (NASUCA) in the above-referenced proceeding. On January 24, 2002, in a transmittal letter, NASUCA stated that it was enclosing an original and four (4) copies of a proprietary version and an original and four (4) copies of public version of its filing. NASUCA noted that it stamped the proprietary version on the top page. The difference between the two versions of the Reply Comments is that the proprietary version contains Appendix B, which itself contains Confidential Line Count Information protected by an existing Protective Order of the FCC. NASUCA also noted in its cover letter that it was filing a set of CD-ROMs with the Reply Comments and that all information on the CD-ROMs is considered confidential. NASUCA also filed a separate transmittal letter with the CD-ROMs which stated that each disc contains alleged confidential and proprietary information and, therefore, has been labeled proprietary.

With this letter, we request specifically that the proprietary version of NASUCA's Reply Comments which contains Appendix B be given confidential treatment by the FCC. This filing contains confidential line count information protected by two existing Orders of the Common Carrier Bureau in these dockets. The Bureau issued an Interim Protective Order on April 7, 2000 which provides that certain Confidential Line Count

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Information is protected and provides for disclosure and use only under specific circumstances. NASUCA requested and received a limited modification of that Order in an Order issued by the Common Carrier Bureau on December 6, 2001. That Order permitted NASUCA to obtain and use the Confidential Line Count Information in producing loop cost studies in evaluating data and cost studies submitted by other parties in this proceeding, which relates to the establishment of a rate for the Subscriber Line Charge. The Order permitting NASUCA access to and use of confidential line count information also requires NASUCA abide by the existing Order protecting that information of April 7, 2000. That Order requires NASUCA to follow the procedures in it relating to requesting confidential treatment of the filing and physically separating the Pleading containing the Confidential Line Count Information from material that is not confidential. NASUCA did this by filing a proprietary version of its Reply Comments which contains Appendix B and a nonproprietary version which does not contain Appendix B.

The Common Carrier Bureau Order of December 6, 2001 requires parties wishing to access the Confidential Line Count Information to file a declaration specific to the cost review proceeding for residential and single line business subscriber line charges in Docket No. 96-262. NASUCA will make available Appendix B to those parties in this proceeding that file such a declaration and provide a copy to NASUCA.

The material in Appendix B has been filed, to date, only in this proceeding involving the cost review for residential and single line business subscriber line charges. As noted above, the material is confidential because it is already protected by the Interim Protective Order entered by the Common Carrier Bureau on April 7, 2000.

NASUCA has filed with USAC and with the FCC declarations specific to this cost review proceeding and has not disclosed the information in Appendix B to any other NASUCA related person who has not signed such a declaration.

For reasons stated, NASUCA requests that the Commission treat this information as confidential under its usual process.

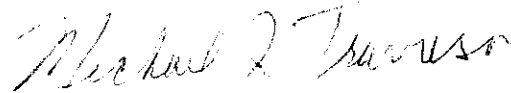
Ms. Magalie Roman Salas

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February 7, 2002

NASUCA also requests that you file this letter in the SLC cost review proceeding docket and post it on the Electronic Comment Filing System. Additionally, NASUCA requests that you post its two original transmittal letters of January 24, 2002, copies enclosed, as well. Should you have any questions, please do not hesitate to call me.

Sincerely,



Michael J. Travieso
Maryland People's Counsel
Chair, NASUCA Telecommunications
Committee as counsel for NASUCA

Maryland Office of People's Counsel
6 St. Paul Street, Suite 2102
Baltimore, Maryland 21202

(410) 767-8150

cc: Chief, Competitive Division
Qualex International

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January 24, 2002

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, D.C. 20554

Re: Common Carrier Docket Nos. 96-262, 94-1

Dear Ms. Salas:

Enclosed please find the Reply Comments of the National Association of State Utility Consumer Advocates in the above-captioned proceeding. Pursuant to the Commission's filing procedures, I have enclosed an original and four (4) copies of a proprietary version and an original and four (4) copies of a public version. The proprietary version is so stamped on the top front page. Please note that there is a set of CD-ROMs associated with each copy. All information contained on the CD-ROMs is considered confidential.

I have also enclosed an additional copy of the first page of the proprietary and nonproprietary version of the document for receipt-stamp which I ask that you return to me in the enclosed postage-paid envelop.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Michael J. Travieso
Michael J. Travieso
Maryland People's Counsel
Chair, NASUCA Telecommunications
Committee as counsel for NASUCA

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January 24, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, D.C. 20554

Re: Common Carrier Docket Nos. 96-262, 94-1, 96-45

Dear Ms. Salas:

Enclosed please find the National Association of State Utility Consumer Advocates compact disc attachment to our comments. Each disc contains alleged confidential and proprietary information. For that reason, each disc has been labeled confidential. In addition, each disc contains a "read me first" file that reminds the reader that the disc contains alleged confidential and proprietary information. There are seven discs. I have enclosed seven (7) copies of each disc pursuant to the Commission's Filing Procedures.

Six of these discs contain the results files associated with the Synthesis model runs. These model runs are the default scenario, the feeder/distribution sharing scenario, the NTS scenario, the cost of capital scenario, the depreciation scenario and the 12k ft scenario. For each model run, there is a separate results file for each study area. In addition, the disc contains the "read me first" file mentioned above. The seventh disc contains 6 workbooks, a file containing macros, and Appendix C. The workbooks transform the model output contained in the results files into SLC costs. There is one workbook for each scenario. The macros provided were used to transform the default scenario into the feeder/distribution sharing and NTS scenario. The macros transform the investments in the default scenario into the investments required by the other two scenarios. Appendix C compares UNE cost to ILEC estimates of the costs of Interstate Loop and Port Costs. The UNE cost were developed from "A Survey of Unbundled Network Element Prices in the US," January 1, 2002, Billy Jack Greg, Consumer

Ms. Magalie Roman Salas
January 24, 2002
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Advocate, West Virginia, and ILEC costs were developed from the ILEC cost submissions provided filed this docket.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Travieso". The signature is written in a cursive, flowing style.

Michael J. Travieso
Maryland People's Counsel
Chair, NASUCA Telecommunications
Committee as Counsel for NASUCA

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MJT:sd